Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the matter of	)	
	)	
Report to Congress Regarding	)	IB Docket No. 11-30
the ORBIT Act	)	

COMMENTS OF INMARSAT PLC

Inmarsat plc ("Inmarsat") submits these Comments in response to the Public Notice inviting input to be reflected in the Commission's progress report to Congress on implementing the Open-Market Reorganization for the Betterment of International Telecommunications Act (the "ORBIT Act").[1] The purpose of the ORBIT Act is to "promote a fully competitive global market for satellite communications services for the benefit of consumers and providers of satellite services and equipment by fully privatizing…INTELSAT and Inmarsat."[2]

Inmarsat converted from an intergovernmental organization ("IGO") to a private company in 1999 in a manner that was ORBIT Act-compliant.[3] In June 2005, the Commission found that Inmarsat had satisfied the requirement to effectuate a substantial dilution of former Signatory financial interests in the company.[4] Just days later, Inmarsat reduced former signatory and foreign government ownership even further, by completing one of the most successful equity IPOs by a satellite services company. Today, Inmarsat's shares are traded on the London Stock

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1 Public Notice, Report No. SPB-234, DA 10-448 (rel. Mar. 17, 2010).

2 *Id.* at 1; *see also* ORBIT Act, Pub. L. No. 106-180, 114 Stat 48, §2 (2000).

3 *See Comsat Corp .d/b/a Comsat Mobile Communications et.al.*16 FCC Rcd 21661 (2001)("Comsat").

4 *Inmarsat Group Holdings Limited, Petition for Declaratory Ruling Pursuant to Section 621(5)(F) of the ORBIT Act*, 20 FCC Rcd 11366 (2005).

Exchange and no former Inmarsat Signatory owns five percent or more of the company and the aggregate ownership by foreign governments is nominal.

Inmarsat, in an effort to respond to aggressive, highly competitive market forces, has continued to invest in new technologies for the diverse mobile satellite service (MSS) customer base. Over the last several years, Inmarsat has invested well over $1.5 billion in the deployment of its fourth-generation, Inmarsat 4 ("I-4") satellite network, which is today providing innovative MSS services to the United States and globally on one of the most advanced mobile commercial communications satellites now in orbit. In 2008, Inmarsat launched the third of its fourth generation satellites, the I4F3, completing world-wide coverage for our broadband capabilities, including Broadband Global Area Network (BGAN). After the successful launch of the I4F3, Inmarsat undertook a major satellite fleet repositioning process that is now providing more efficient coverage for Inmarsat users.[5] In addition, Inmarsat completed construction of and was granted Commission authorization for a Satellite Access Station in Paumalu, Hawaii to connect user terminal traffic to the public switched network and the Internet.[6]

In order to remain competitive in today's current MSS market, Inmarsat's I-4 fleet is continuing to adapt to support IP-based communications. Using highly portable and easily deployed "notebook sized" antennas that are one-third the size, weight, and price of traditional Inmarsat terminals, BGAN provides voice and broadband service at speeds of almost half a megabit per second. End users continue to deploy BGAN in new and innovative ways.[7]

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5 *See*, Inmarsat Press Release, Inmarsat Broadband Goes Global (Feb. 26, 2009) announcing completing of global coverage for Inmarsat broadband services.

6 *See*, File No. SES-LIC-20080306-00242, Call Sign E080059 (granted Dec.18, 2008); File No. SES-MFS-20080228-00207, Call Sign KA 25 (granted Dec. 18, 2008).

7 *See*, Inmarsat News, Scientists track lemming predators to solve age old mystery (May. 5, 2010); BGAN pivitol in Sahara water conservation campaign (May 19, 2010); Emergency comms kit helps saves lives after typhoon

Inmarsat and its distributors continue to evolve the current service to better meet the needs of existing and potential customers.[8]

Inmarsat has a formal agreement with the International Telecommunication Union to enable the United Nations agency to help countries better prepare for and respond during disasters.[9] Inmarsat's BGAN technology played a critical role supporting government and non-governmental agencies, such as Télécoms Sans Frontières and the American Red Cross, as well as international news organizations in response to global disasters including the recent Japanese earthquakes and tsunami, Chilean earthquake, ChristChurch earthquake, Pakistan floods, Gulf of Mexico Oil spill and Chilean mine disaster.[10]

In addition, Inmarsat continues to introduce entirely new services over L-band, including the IsatPhone Pro handheld and low data rate services. In 2010, Inmarsat launched a worldwide Global Satellite Phone Service over its I4 geostationary fleet with a modernized handset call the IsatPhone Pro.[11] The IsatPhone Pro is the first handset to be purpose-built for the Inmarsat network, and is the first product in Inmarsat's GSPS family. The IsatPhone Pro has been optimized to deliver superior performance over Inmarsat's advanced mobile satellite network, and will support satellite telephony, including circuit switched voice, voicemail, Bluetooth for hands free use, and

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(July 26, 2010); Singapore Airlines signs up for complete OnAir offering (October 11, 2010); Borneo expedition shares experiences with videoconferences (Jan. 17, 2011).

8 *See*, Inmarsat News, New SwiftBroadband class connects smaller aircraft (May 19, 2010); New 176kbps streaming delivers quality at lower cost (June 18, 2010); 505 Emergency Calling helps rescue sailor stranded on raft (Feb. 8, 2011); New FleetBroadband service will support telemetry and tracking (Feb. 22, 2010).

9 *See*, Inmarsat News, ITU deploys BGAN for telemedicine after Pakistan floods (Nov. 26, 2011).

10 *See*, Inmarsat News, Gulf of Mexico oil spill: BGAN plugs comms hole (June 11, 2010); TSF provides emergency comms support in Kyrgyzstan (June 23, 2010); TSF ends Pakistan mission after calls help 94,000(Oct. 4, 2010); Broadcasters use BGAN to relay drama of Chilean miners' rescue (Oct. 15, 2010); TSF deployed after tsunami sweeps Indonesian islands (Nov. 1, 2010); TSF helps UN and Colombian government combat floods (Jan 5, 2011) Christchurch earthquake relief efforts trigger data surge (Feb. 25, 2011).

11 *See*, Inmarsat News, Inmarsat launches its first global handheld, IsatPhone Pro (June 15, 2010).

supplementary services. In 2011, the IsatPhone Pro will also support text and email messaging. Since its release in June 2010, the IsatPhone Pro has stacked up against the competition and proven to be invaluable in disaster situations across the globe.[12]

In 2010 and 2011, Inmarsat's land portfolio has and will continue to grow in the low data rate services.[13] The low data rate services offered will provide tracking, monitoring, and M2M applications. Inmarsat's current portfolio includes IsatM2M, providing tracking services. In 2011, Inmarsat will launch its IsatData Pro service and BGAN M2M service for monitoring and Supervisory Control and Data Acquisition (SCADA) solutions.

To respond to the growing need for additional bandwidth in the market, Inmarsat announced in August 2010 a $1.2 billion investment into three new I-5 Ka-band satellites to be launched starting in 2013 for a new high bandwidth service called Global Xpress.[14] In preparation for the new service, Inmarsat has contracted with iDirect to provide the ground infrastructure and core module technology to integrate into the new satellite terminals.[15] Inmarsat has also announced Sea Tel will be the first terminal manufacturer in the maritime market producing a new terminal fully operational with Global Xpress in the Ka band.[16]

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12 *See*, Inmarsat News, Independent study validates claims for IsatPhone Pro (Feb. 4, 2011); IsatPhone Pro proves invaluable during Queensland cyclone (Feb. 9, 2011).

13 *See*, Inmarsat News, Kenyan off road charity race tracked minute by minute (June 2, 2010) Oil and gas fields monitored remotely via BGAN (Sept 15, 2010) *See,* Inmarsat Press Release "New global low rate service announced (March 15, 2011) announcing information about IsatData Pro.

14 *See*, Inmarsat News, Inmarsat to Invest US $1.2 bn in Ka-band network (Aug. 8, 2010) announcing investment in new satellites and network.

15 *See*, Inmarsat News, iDirect awarded new contract for Global Xpress infrastructure (Feb. 18, 2011).

16 *See*, Inmarsat News, Global Xpress maritime terminal launch partner named (March 3, 2011).

Inmarsat respectfully submits the above information to assist the Commission in preparing its forthcoming report to Congress.

Respectfully submitted,

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